

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
(WEST PALM BEACH DIVISION)

CASE NO. 09-80480-CIV-HURLEY/HOPKINS

(Ancillary Proceeding to U.S.D.C. Case no. 08-81565-CIV-HURLEY/HOPKINS)

JOHNATHAN E. PERLMAN, Esq., as court

Appointed Receiver of Creative Capital

Consortium, LLC, et al.,

Plaintiff

v.

DOROTHY DELISFORT-THEODULE, an individual,

WEALTH BUILDERS CIRCLE, LLC, a Georgia

Limited liability company; CARIBBEAN AIRWAYS, LLC

A Florida limited liability company; DONNA HAVER, INC,

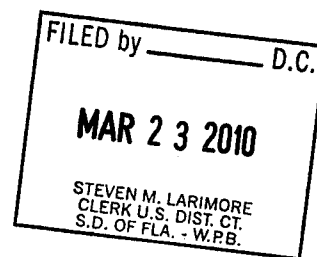
A Florida limited liability company; GOOD BUY HOMES, INC.,

A Florida corporation; INTERNATIONAL DEVELOPMENT ENTREPRENEURS OF AMERICA, INC., a Florida corporation;

And COMPLETE AUTO REPAYMENT SOLUTIONS, INC.,

A Georgia corporation,

Defendants



DEFENDANT DOROTHY-DELISFORT-THEODULE'S

MOTION FOR CHANGE OF VENUE

Defendant Dorothy Delisfort-Theodule hereby files this Motion for Change of Venue, showing the following:

1.

At all material times Defendant has resided in the State of Georgia and has never conducted business in the State of Florida.

2.

The allegations made in this lawsuit against the Defendant are that she conspired with, aided and abetted George Theodule and/or his Creative Capital entities in breaches of fiduciary duty, conversion, and that she has been unjustly enriched by fraudulent transactions.

3.

Defendant's only connection to the list of Defendants is with the two Georgia corporations and she has no knowledge of the operations of the Florida Defendants.

4.

Defendant is of the opinion that she is this lawsuit because she married George Theodule in September 2008, at a time when most of the transactions alleged in this lawsuit had already taken place in Florida without any knowledge on her part.

5.

Defendant is prepared to show that the allegations against her in this lawsuit are unjustified, but she is experiencing extreme hardship in finding time and money to travel to Florida to defend herself and she is unable to afford legal representation in that State.

6.

Defendant is a registered nurse employed to a hospital in Georgia and cannot find the time and funds to meet the commands of this Court without prejudicing her job and the ability to care for her two infant children.

7.

Plaintiff would not be prejudiced if the suit were to be transferred to Georgia. Already, Defendant has been deposed three times in Georgia and all the records already provided to Plaintiff emanate in Georgia. There are none in Florida.

8.

Most of my potential witnesses reside in Georgia and would not be willing or able to travel to Florida for a trial.

9.

Justice can be served by transferring the lawsuit to Georgia where Defendant's meager resources would enable her to better respond to the Plaintiff's inquiries about her role in

this investigation into the funds transferred to Defendant from George Theodule.
**WHEREFORE, Defendant prays for a change of venue to the more convenient
venue in Georgia.**

Dated this 22nd day of March 2010.



Dorothy Delisfort-Theodule

Pro Se Defendant

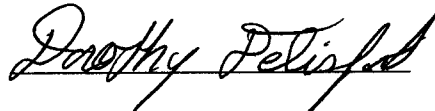
**2108 New London Place
Snellville, Georgia 30078
(678) 908 0006**

CERTIFICATE OF SERVICE

I certify that I mailed a true copy of the foregoing Motion for Transfer of Venue to the Plaintiff addressed as follows:

**Genovese, Joblove and Battista, PA
4400 Bank of America Tower
100 Southwest Second Street
Miami, FL 33131**

This 22nd day of March 2010


Dorothy Delisfort-Theodule